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FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re

Amendment of the Commission's
Rules to Establish a Single AM
Stereo Transmission Standard

Reply to Comments on ET Docket No. 92-298

From Warren G. Smith, Broadcast Technical Consultant
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I am writing to express my opinion on the Commission's comments stating that the Motorola Stereo system is the "strong choice of broadcasters". I disagree. Even the Congressional role in mandating a national standard is not based on any statistical data other than the ten percent rule. To assume that because ten percent of AM stations purchased the Motorola system should protect them from obsolescence is unfair. In fact, a more accurate statement would be that the ninety percent who did not choose the Platform effect, poor mono coverage, and high sensitivity to electrical interference have spoken against Motorola.

I have installed two Motorola stations and five Kahn stations since 1984. I have excellent hearing and good communication skill with the general public. Our experiences speak much louder than the lobbyists and propaganda supporting a failed technical system. After nearly four years in Florida Radio, we are using the Kahn Power-side to eliminate interference due to power line reradiation. Management at the Kahn stations preferred the quality of the Kahn system over the already existing Motorola stations. One Motorola station sold their exciter and switched to mono. The remaining stations using that system were visited by the F.C.C. immediately after the NRSC-I law took effect. I asked the Tampa office how they chose the stations to visit in this market. I was told that they carefully tuned across the dial and chose the stations that were the most likely violators. Those stations were the Motorola stereo stations in the market. Not one mono station was selected for testing or visitation.

I would hope that in a required F.C.C. selection that more time would have been given to allow for comments and replies to this Docket. My thanks to the Commission for attempting to permit the marketplace to decide. Unfortunately, the multimode concept that NTIA approved was stopped in 1985 by the Motorola muscle. I have telephone logs of calls to Sony of Miami to prove that we were prepared to promote the Kahn and Motorola stations in our market when the legal machinery stopped the delivery of the first multimode radios to the USA.

The Commission's own comments concerning the Motorola system clearly indicate that the selection has nothing to do with the technical advantages that this system would provide. In fact under close scrutiny it is clear that the choice is purely due to the number of Motorola induced radios and a handful of radio stations that selected or were forced to pick the Motorola system. About a hundred of those stations were former Harris stations that had no choice to save face but to accept the deal provided to them to make the switch.

Why not do the right thing and permit the Bureau of Standards to study and select the best system for America! I submit that the countries listed that have already chosen the Motorola system did not make the choice for the betterment of AM Radio. Motorola also does a wonderful job of marketing a multiplicity of other products as well. It does not take a rocket scientist to know that internationally, the best system could be the one that causes the least problems with cellular telephone systems. I do not recall any fireworks going off when the other nations picked the AM stereo system for their standard. In fact, the choices were quietly written into laws with little fanfare and no mention of superiority.

I want my name on the list of those who stood in opposition to the "defacto standard" selection of a system whose time has run out. In spite of the millions spent to hype a technically inferior and mono-degrading system, the broadcasters (nearly ninety percent) have spoken. We await the selection of the best system and will add stereo as the improved

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AM receivers appear on the market. Perhaps Congress can require minimum receiver standards to match the AM Stereo Standard.

Most of all, in turning down the Motorola system, you will be making it possible for the expanded band to work. I tested and employed Motorola on 1600 Kilohertz. For the first week, we were excited about the quality of stereo. When the skywave rolled in, the owner asked engineering to turn off the pilot during critical hours and at night. A year later, the station was sold and the equipment returned. If 1600 Kilohertz won't work at night, how can 1610 and higher do better? Please for the sake of the new age of AM radio, select a standard only after turning this issue over to the scientific community.

Respectfully submitted,


Warren Gerold Smith, Jr.